

17, lines 56-67, col. 18, lines 1-5, col 19, lines 20-45, col. 20, lines 14-37 and figures 12-19, 22 and 25 to support the contention that Bier et al. teaches or suggests “a vector normal to a viewing surface.” Applicant respectfully submits that the cited sections do not teach or suggest “a vector normal to a viewing surface.”

Applicant respectfully submits that at col. 17, lines 56-67 and col. 18, lines 1-5 Bier et al. teaches the generalization of a rotation tool to perform “any of rotation, scaling, and skewing.” Thus, Bier et al. at col. 17, lines 56-57 and col 18, lines 1-5 does not teach or suggest “a vector normal to a viewing surface.”

Applicant respectfully submits that at col. 19, lines 20-45 Bier et al. teaches tools that “extract graphical properties of objects.” Thus, Bier et al. at col. 19, lines 20-45 does not teach or suggest “a vector normal to a viewing surface.”

Applicant respectfully submits that at col. 20, lines 14-37 Bier et al. teaches the alternate presentation of tools. Thus, Bier et al. at col. 19, lines 20-45 does not teach or suggest “a vector normal to a viewing surface.”

Applicant has studied figures 12-19, 22 and 25 and respectfully submits that they do not teach or suggest “a vector normal to a viewing surface.” None of the cited figures show “a vector normal to a viewing surface.”

Since the cited references do not teach or suggest each of the elements of the rejected claims, the Office Action does not present a *prima facie* case of obviousness. Therefore, applicant requests withdrawal of the rejections and reconsideration and allowance of claims 1-19.

So called “prior art” “made of record but not relied upon”

Several patents were cited as “pertinent to applicant’s disclosure” but not relied upon to reject claims. In view of the fact that the patents were not asserted against any claims, applicant need not respond either to the assertion of their pertinence or to the assertion that any of the listed patents constitutes “prior art” to any pending claim. Applicant expressly reserves the right to challenge any such assertion, should it be included in some future rejection.

Allowable Subject Matter

Claim 20 was allowed.

Conclusion

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone applicant's attorney at (612) 371-2109 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

JOHN DAVID MILLER

By their Representatives,

SCHWEGMAN, LUNDBERG, WOESSNER & KLUTH, P.A.

P.O. Box 2938

Minneapolis, MN 55402

(612) 371-2109

Date

August 22, 2001

By

Danny J. Padys
Danny J. Padys
(Reg. No. 35,635)

CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Commissioner of Patents, Washington, D.C. 20231, on this 22 day of August, 2001.

Jane E. Brockschink

Name

Jane Brockschink
Signature